

CONDENSED TRANSCRIPT

Deposition of: Ronald M. Gonda

September 10, 2003

Ronald M. Gonda vs.
Metropolitan Life Insurance Company, et al.

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<p style="text-align: right;">Page 29</p> <p>1 R. Gonda - by Ms. Lipman</p> <p>2 ready.</p> <p>3 A. (Reviewing document.)</p> <p>4 MS. LIPMAN: Let me put on the</p> <p>5 record that the document that's been marked</p> <p>6 Exhibit 5 has Bates numbers RMG 9 through 31 at</p> <p>7 the bottom.</p> <p>8 Q. If we could, Mr. Gonda, flip to the</p> <p>9 back of the document. There are some Bates</p> <p>10 numbers.</p> <p>11 Can you read the Bates numbers that</p> <p>12 are on the bottom? There is a little number at</p> <p>13 the right. Can you read those?</p> <p>14 A. Yes.</p> <p>15 Q. I want to go to the page marked 27.</p> <p>16 Pages 27 through -- 27 through 30 are an</p> <p>17 application for life insurance.</p> <p>18 Have you seen this document before,</p> <p>19 this portion of the document before?</p> <p>20 A. I'm not sure.</p> <p>21 Q. Is any of the handwriting on that</p> <p>22 first page your handwriting?</p> <p>23 A. No.</p> <p>24 Q. Let's go to the page that's marked</p> <p>25 at the bottom as 30. There is a signature in</p>	<p style="text-align: right;">Page 31</p> <p>1 R. Gonda - by Ms. Lipman</p> <p>2 A. Yes.</p> <p>3 MS. LIPMAN: Could you mark</p> <p>4 this document.</p> <p>5 (Gonda Exhibit No. 6 was marked</p> <p>6 for identification.)</p> <p>7 Q. For purposes of identification, the</p> <p>8 document that's been marked Exhibit 6 is Bates</p> <p>9 numbered at the side with MetLife Bates No. MP</p> <p>10 2157000139.</p> <p>11 Mr. Gonda, I would ask that you take</p> <p>12 a look at that document and let me know when</p> <p>13 you're ready.</p> <p>14 A. (Reviewing document.) Okay.</p> <p>15 Q. Have you seen this document before?</p> <p>16 A. I am not sure.</p> <p>17 Q. There is a signature at the bottom.</p> <p>18 It is a little hard to see because this is a</p> <p>19 copied document. Is that your signature?</p> <p>20 A. I'm not sure.</p> <p>21 Q. Is any of the handwriting on this</p> <p>22 page your handwriting?</p> <p>23 A. No.</p> <p>24 Q. Do you think that the signature is</p> <p>25 not your signature?</p>
<p style="text-align: right;">Page 30</p> <p>1 R. Gonda - by Ms. Lipman</p> <p>2 the middle of the page to the right. Is that</p> <p>3 your signature?</p> <p>4 A. I'm not sure. It could be. I'm not</p> <p>5 sure.</p> <p>6 Q. Do you recall, in your first meeting</p> <p>7 with Mr. Friedt, providing him any -- do you</p> <p>8 recall him asking you any questions and you</p> <p>9 providing him answers that he may have recorded</p> <p>10 on an application for life insurance?</p> <p>11 A. I'm not sure. I don't know. That</p> <p>12 was like ten years ago.</p> <p>13 Q. Do you have any reason to think that</p> <p>14 the signature on page 30 is not your signature?</p> <p>15 A. I'm not sure.</p> <p>16 Q. Turning to the page that's been</p> <p>17 marked -- that has the Bates No. 29 at the</p> <p>18 bottom, do you see that in the middle of the</p> <p>19 page it says, "C, applicant is replacing Pruco</p> <p>20 life policy"?</p> <p>21 A. Yes.</p> <p>22 Q. Did you discuss that with Mr.</p> <p>23 Friedt?</p> <p>24 A. Yes.</p> <p>25 Q. Is that a yes?</p>	<p style="text-align: right;">Page 32</p> <p>1 R. Gonda - by Ms. Lipman</p> <p>2 A. I'm not sure. I don't know.</p> <p>3 Q. Do you think that it could be your</p> <p>4 signature?</p> <p>5 A. It could be. I don't know.</p> <p>6 Q. When you met with Mr. Friedt for the</p> <p>7 first time, is it your understanding that you</p> <p>8 were applying for life insurance?</p> <p>9 A. No. He just wanted to come out and</p> <p>10 talk to me about life insurance. I ended up</p> <p>11 buying it off him.</p> <p>12 Q. You ended up buying it from him?</p> <p>13 A. Yes.</p> <p>14 MS. LIPMAN: Let me just use</p> <p>15 this again (indicating).</p> <p>16 MS. ERNSBERGER: You can put</p> <p>17 that one away.</p> <p>18 MS. LIPMAN: These are the</p> <p>19 marked exhibits.</p> <p>20 Q. Let's keep them here. Let's keep</p> <p>21 those two in front of him, them (indicating).</p> <p>22 I think you said, Mr. Gonda, that</p> <p>23 the first meeting was maybe about a half hour;</p> <p>24 is that right?</p> <p>25 A. Yes. Something like that.</p>

8 (Pages 29 to 32)